

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

PRESIDENT DONALD J. TRUMP,
an individual,

Plaintiff,

v.

CBS BROADCASTING INC., a
New York corporation and CBS
INTERACTIVE INC., a Delaware Corporation

Defendants.

Case No.: 2:24-CV-00236-Z

JURY TRIAL DEMANDED

**SECOND CONSENT MOTION FOR AN EXTENSION OF TIME TO RESPOND TO
DEFENDANTS' MOTION TO DISMISS FOR LACK OF PERSONAL
JURISDICTION AND IMPROPER VENUE OR, IN THE ALTERNATIVE,
TO TRANSFER AND DEFENDANTS' MOTION TO DISMISS
THE COMPLAINT FOR LACK OF SUBJECT MATTER JURISDICTION AND
FAILURE TO STATE A CLAIM**

Defendants CBS Broadcasting Inc. and CBS Interactive Inc. have filed (1) a “Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue or, In the Alternative, to Transfer,” and (2) a “Motion to Dismiss the Complaint for Lack of Subject Matter, Jurisdiction and Failure to State a Claim” (the “Motions”).

Plaintiff respectfully requests, per agreement of the Parties, that the Court extend until January 24, 2025 Plaintiff’s deadline to file an Amended Complaint in response to the Motions, or, in the alternative, to file oppositions to the Motions.

The Parties have further agreed that, if the extension is granted, Defendants will have until February 21, 2025 to file any responsive pleadings or renewed motions, or if Plaintiff files oppositions to the Motions, to file any reply papers.

Plaintiff's counsel has conferred with counsel for Defendants, and all parties have consented to this motion in writing.

Respectfully submitted,

EDWARD ANDREW PALTZIK
Texas Bar No. 24140402
Bochner PLLC
1040 Avenue of the Americas
15th Floor
New York, NY 10018
(516) 526-0341
edwardb@bochner.law

/s/ Edward Andrew Paltzik
Edward Andrew Paltzik

DANIEL Z. EPSTEIN
Texas Bar No. 24110713
16401 NW 37th Avenue, #209E
Miami Gardens, FL 33054
(202) 240-2398
dan@epsteinco.co

/s/ Daniel Z. Epstein
Daniel Z. Epstein
(applying for admission *pro hac vice*)

CHRIS D. PARKER
Texas Bar No. 15479100
Farris Parker & Hubbard
A Professional Corporation
P. O. Box 9620
Amarillo, TX 79105-9620
(806) 374-5317 (T)
(806) 372-2107 (F)
cparker@pf-lawfirm.com

/s/ Chris D. Parker
Chris D. Parker

CERTIFICATE OF CONFERENCE

I certify that on the 13th day of January, 2025 I conferred with attorney Elizabeth McNamera, counsel for Defendants. Ms. McNamara stated that she is in agreement with this Motion.

/s/ Edward Paltzik
Edward Paltzik

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served pursuant to the Federal Rules of Civil Procedure on the 13th day of January, 2025, via the Northern District of Texas's electronic filing notification system.

/s/ Chris D. Parker
Chris D. Parker